

UNITED STATES OF AMERICA
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CR# 03-10362 PBS

SEAN D. STARK

**DEFENDANT'S MOTION FOR TRANSPORTATION FROM
ARIZONA TO MASSACHUSETTS FOR TRIAL, AND
FOR FUNDS TO PAY FOR A HOTEL DURING THE TRIAL**

Request is hereby made on behalf of Sean D. Stark for non-custodial transportation to be arranged by the United States Marshal at government expense pursuant to 18 U.S.C. §4285, so he can travel to Massachusetts for his trial and return to Arizona at the completion of the trial.

Request is also made for per diem expenses for food and lodging in Boston during the duration of the trial.

Such request is by his attorney, Melvin Norris, who has been appointed to represent Sean D. Stark, and assigns as reason therefore the following:

1. The defendant is indigent and without funds to pay for transportation and expenses to come to and return from his trial, and has been found by the Court to be indigent.
2. The defendant resides in Tucson, Arizona, and requires air transportation to come to and return from his trial in Boston.
3. The defendant is charged with Conspiracy to Distribute Marijuana and to Possess with Intent to Distribute Marijuana, and the trial is scheduled for the week of December 12, 2005.

4. The defendant requests that he be able to arrive in Boston on Sunday, December 11, 2005 in order to be prepared for trial the next morning.
5. The trial on this matter will last more than one day, and possibly as long as a week.
6. The defendant does not have a place to stay during the duration of the trial, and requires per diem expenses for food and lodging while here.
7. Justice dictates that this motion be allowed.

WHEREFORE, the defendant requests that the Marshal arrange for non-custodial transportation for Mr. Stark to come to Massachusetts for the trial at government expense, and for the government to provide Mr. Stark with per diem expense moneys for lodging and food.

By his attorney,

Date: December 1, 2005

/s/ Melvin Norris
Melvin Norris
260 Boston Post Road
Wayland, MA 01778
(508) 358-3305
BBO# 373900